

WILLIAM A. NEWSOM
 S.B. I. # 257317
 DELAWARE CORRECTIONAL CENTER
 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

WILLIAM A. NEWSOM,
 PLAINTIFF,

C. A. No. 05-673 (GMS)

VS.

COMMISSIONER STANLEY W.
 TALOR, BUREAU CHIEF PAUL
 HOWARD, DEPUTY WARDEN DAVID
 PIERCE, CAPTAIN SAGERS,
 SECURITY SUPERINTENDENT
 CUNNINGHAM, FIRST
 CORRECTIONAL MEDICAL, LLC,
 DR. SITTA B. ALIE,
 DEFENDANTS.

NOTICE OF MOTION;
 MOTION FOR EXTENSION
 OF TIME



TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

YOU ARE HEREBY NOTIFIED THAT ON JUNE 30, 2006, PLAINTIFF WILLIAM A. NEWSOM NOW BRINGS THIS MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS ANSWER TO COMPLAINT/MOTION TO DISMISS DATED JUNE 26, 2006 BY DEPUTY ATTORNEY GENERAL EILEEN KELLY AND JUNE 27, 2006 BY DANIEL MCKENTY, ESQ AND DANA SPRING MONZO, ESQ. ATTORNEYS FOR FIRST CORRECTIONAL MEDICAL, LLC. PLAINTIFF WILL MOVE THE COURT TO GRANT AN EXTENSION OF TIME TO RESPOND TO THE MOTIONS ON OR BEFORE AUGUST 18, 2006. PLAINTIFF MAKES THIS REQUEST DUE TO LIMITED TIME AVAILABLE TO HIM AT THE PRISON LAW LIBRARY, AS WELL AS THE FACT THAT THE PLAINTIFF HAS TO RESPOND TO (2) SEPERATE MOTIONS TO DISMISS FILED BY (2) DIFFERENT SETS OF COUNSEL

FOR THE DEFENDANTS.

THIS MOTION IS BASED ON ALL PAPERS FILED
AND RECORDS IN THIS ACTION TO DATE.

DATED: JUNE 30, 2006

William A. Newsom

WILLIAM A. NEWSOM, PLAINTIFF

MOTION REQUESTING EXTENSION OF TIME TO RESPOND
TO DEFENDANT'S ANSWER TO COMPLAINT/MOTION TO DISMISS

PLAINTIFF RESPECTFULLY REQUESTS, PURSUENT TO FED. R. CIV. P. 6(b), AN ORDER GRANTING AN EXTENSION OF TIME TO RESPOND TO DEFENDANT'S ANSWER TO COMPLAINT/MOTION TO DISMISS, TO AUGUST 18, 2006.

THIS MOTION IS MADE ON THE GROUNDS THAT:

- 1) PLAINTIFF RECEIVED SERVICE OF STATE DEFENDANT'S ANSWER TO COMPLAINT/MOTION TO DISMISS DATED JUNE 26, 2006, ON JUNE 27, 2006, WITH A LONG COMPLICATED LIST OF AFFIRMATIVE DEFENSES THAT THE PLAINTIFF MUST RESEARCH DUE TO HIS LIMITED LEGAL KNOWLEDGE.
- 2) PLAINTIFF RECEIVED SERVICE OF DEFENDANT'S FIRST CORRECTIONAL MEDICAL, LLC. ANSWER TO COMPLAINT/MOTION TO DISMISS DATED JUNE 27, 2006, ON JUNE 28, 2006, WITH A LONG COMPLICATED LIST OF AFFIRMATIVE DEFENSES THAT THE PLAINTIFF MUST RESEARCH DUE TO HIS LIMITED LEGAL KNOWLEDGE.
- 3) PLAINTIFF, WHO IS REPRESENTING HIMSELF ON A PRO SE BASIS, IS ALLOWED ACCESS TO THE PRISON LAW LIBRARY ONLY SIX HOURS PER WEEK WHICH PREVENTS HIM FROM COMPLETING THE NECESSARY LEGAL RESEARCH REQUIRED TO PROPERLY RESPOND TO DEFENDANT'S MOTION.

4) PLAINTIFF HAS REQUESTED NO PREVIOUS
EXTENSIONS OF TIME IN THIS MATTER AND
TO DATE, ALL OF HIS FILINGS WITH THE
COURT HAVE BEEN MADE IN A TIMELY MANNER.

RESPECTFULLY SUBMITTED THIS 30TH DAY OF JUNE, 2006,

BY: William A. Newsom

WILLIAM A. NEWSOM
S.B.I. # 257317
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE
19977

CERTIFICATE OF SERVICE

I, WILLIAM A. NEWSOM, HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT A TRUE AND CORRECT COPY OF THE NOTICE OF MOTION AND MOTION FOR EXTENSION OF TIME HAS BEEN PROVIDED TO THE BELOW LISTED PARTIES, BY PLACING SAID MOTION IN A POSTAGE PAID ENVELOPE AND MAILING SAID ENVELOPE VIA UNITED STATES MAIL THIS 30TH DAY OF JUNE, 2006 TO DANIEL MCKENTY, ESQ. AND DANA SPRING MONZO, ESQ. ATTORNEY OF RECORD FOR DEFENDANT FIRST CORRECTIONAL MEDICAL, LLC., AS WELL AS TO EILEEN KELLY, ESQ. ATTORNEY OF RECORD FOR STATE DEFENDANT'S.

William A. Newsom

WILLIAM A. NEWSOM
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19977

JUNE 30TH 2006

DATE

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SBI# 257317 UNIT V-Bldg./B-8
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